

UNITED STATES OF AMERICA,)
)
v.) Crim. No. 01-455-A
)
ZACARIAS MOUSSAOUI)

COMES NOW, the defendant, by counsel, and moves this Honorable Court to amend the list of defense personnel who are approved by the Court for access to classified documents in the above-styled matter by adding Steven Tabackman, a consultant with respect to utilization of the litigation support system and a potential defense summary witness and, in support thereof respectfully states as follows:

2. Inasmuch as the defense requires Mr. Tabackman to have access to these documents in order to prepare for its defense, it is hereby requested that he be added to the list of persons as set forth in ¶12 of the Order.

3. Mr. Tabackman has submitted the required Standard Form 86.

4. Given the large volume of discovery, both classified and unclassified, which the government has produced, the defense needs the support of Mr. Tabackman to assist in the implementation of our litigation support system as well as to provide testimony as a summary witness at trial. This latter role will require Mr. Tabackman to be knowledgeable of information that his classified.

WHEREFORE, for the foregoing reasons, it is hereby requested that:

(a) Steven Tabackman be added to the list of those approved for access to classified documents.

Respectfully submitted,

STAND-BY COUNSEL

/S/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Motion to Amend Access to Classified National Security Information was served upon AUSA Robert A. Spencer, AUSA, David Novak, and AUSA Kenneth Karas, U.S. Attorney's Office, 2100 Jamieson Avenue, Alexandria, VA 22314, via facsimile and by placing a copy BY HAND in the box designated for the United States Attorney's Office in the Clerk's Office of the U.S. District Court for the Eastern District of Virginia and via first class mail to Zacarias Moussaoui, c/o Alexandria Detention Center, 2001 Mill Road, Alexandria, VA 22314 this 12th day of September 2002

/S/

Frank W. Dunham, Jr.

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THIS MATTER came on to be heard upon motion of the defendant to amend access to classified national security information; and

1. That Steven Tabackman is hereby approved to have access to classified information pursuant to the Protective Order dated January 22, 2002, subject to compliance with all terms and conditions of that Order

4. The Clerk of this Court shall furnish a copy of this Order forthwith to counsel for the defendant, counsel for the government, and Court Security Officer, Christine E. Gunning.

HONORABLE LEONIE M. BRINKEMA
UNITED STATES DISTRICT JUDGE